

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SIRAJ IBN WAHHAJ, et al.,

Defendants.

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Cause No. 18 CR 2945 WJ

**SIRAJ WAHHAJ’S NOTICE OF JOINDER IN MOTION TO COMPEL CIPA
DISCOVERY AND REQUEST FOR ADDITIONAL INFORMATION**

SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, Thomas Clark and Marc H. Robert, notifies the Court and all parties of his joinder in the Defendants’ Motion to Compel CIPA discovery [Doc. 702] (“Motion to Compel” or “MTC”) and requests additional information beyond that requested in the MTCoriginal motion, and in support of the motion and his request for additional information would respectfully show the Court as follows:

Mr. Wahhaj adopts the “Background” (*see* MTC starting at 1), “Law (*see* MTC starting at 6)” and “Argument” (*see* MTC starting at 10) sections of the Motion to Compel and incorporates the same herein by this reference for all purposes. The Motion to Compel was filed by counsel for Defendant Subhanah Wahhaj on March 31, 2023 [Doc. 702]. The Motion to Compel was joined by all Defendants. *See* MTC at 1.

The Motion to Compel requests information regarding investigations of the Defendants for suspected terroristic and other activities beginning in 2009. See Motion to Compel, pp 5-6. In discussions with Mr. Wahhaj, counsel learned that Mr. Wahhaj understands that such investigations of him and his family began much earlier, in at least 2003. Accordingly, Mr. Wahhaj requests the disclosure of the categories of information specified in the Motion to Compel concerning investigations of him and his family ranging back to 2003, and any information that led to classified or other restrictions on Mr. Wahhaj's travel from 2003 forward. For the reasons set forth in the Motion to Compel, the requested information is significantly exculpatory and relevant at trial.

WHEREFORE, SIRAJ IBN WAHHAJ, Defendant, by and through the undersigned counsel, respectfully notifies the Court and all parties of his joinder in the Motion to Compel; requests the disclosure of the information requested in the MTC beginning in 2003, rather than just from 2009; and providing for such other and further relief to which the Court may find Mr. Wahhaj to be justly entitled.

Respectfully Submitted,

/s/ **Electronically filed on 5/1/23**

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